

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Air Pollution Control 9th Floor, L & C Annex 401 Church Street Nashville, TN 37243-1531

June 2, 2008

Mr. Michael G. Knight Manager, ES&H and Performance Assurance Babcock & Wilcox Technical Services Clinch River, LLC 767 Boeing Road Oak Ridge, TN 37830

Re:

<u>01-0236-02</u> 61977

Dear Mr. Knight:

This correspondence is in response to your application dated May 7, 2008. The information which you provided has undergone a preliminary review by the permit program. Your facility is located in a nonattainment area for ozone. Pursuant to Tennessee Air Pollution Control Regulations 1200-3-9-.01(5)(b)2.(ii), "All minor stationary sources, and minor modifications proposing to construct in a nonattainment area shall utilize best available control technology (BACT) for the nonattainment pollutant (nitrogen oxides and volatile organic compounds) as specified by the Technical Secretary at the time of the completed permit application."

It has been determined that the new machining operation described in your application is utilizing BACT for the pollutant of concern and would constitute an *insignificant activity* or *insignificant emissions unit*, as defined in part 1200-3-9-.04(2)(a)3. of the Tennessee Air Pollution Control Regulations. Specifically, the proposed operation would result in potential emissions from the source of less than five (5) tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.

For new sources, subparagraph 1200-3-9-.04(4)(a) of the Tennessee Air Pollution Control Regulations requires that the request for designation as an insignificant emissions unit be made at least thirty (30) days prior to the estimated starting date of construction. Your application is accepted as the required notification. All applicable air pollution regulations must still be met by your facility.

If you have any questions concerning this correspondence, please contact Travis Blake at (615) 532-0617.

Sincerely,

John A. Trimmer

Chief, East Tennessee Permit Program

John a. Frimmer

JAT/TJB

cc: Knoxville Environmental Field Office

01-0236-02-S2

Green File

TJB

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF AIR POLLUTION CONTROL NASHVILLE, TENNESSEE 37243-1531



Memorandum

To:

01-0236-02-S2

From:

Travis Blake

Date:

June 2, 2008

Subject:

Exemption Request

Babcock & Wilcox sent applications requesting exemption of a machining operation pursuant to TAPCR 1200-3-9-.04(4)(d)18. Total coolant usage was not provided, so it was not possible to determine whether the machining operation meets the exemption requirement of 60 gallons/month of total solvent usage. Emission calculations included with the applications indicate that the source does meet the insignificant activity threshold of 5 tons/year for criteria pollutants and 1,000 lb/year for HAPs.